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CONSOLIDATED SOAH DOCKET 473-19-1265 CONSOLIDATED PUC DOCKET NO. 48785

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JOINT APPLICATION OF ONCOR	§	BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY	§	
LLC, AEP TEXAS INC., AND LCRA	§	
TRANSMISSION SERVICES	§	OF
CORPORATION TO AMEND THEIR	§	
CERTIFICATES OF CONVENIENCE	§	ADMINISTRATIVE HEARING
AND NECESSITY FOR 345-KV	§	
TRANSMISSION LINES IN PECOS,	§	
REEVES, AND WARD COUNTIES,	§	
TEXAS (SAND LAKE TO SOLSTICE	§	
AND BAKERSFIELD TO SOLSTICE)	§	

PLAINS MARKETING, L.P. AND PLAINS PIPELINE, L.P. RESPONSE TO ORDER NO. 11

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

Intervenors Plains Marketing, L.P. and Plains Pipeline, L.P. ("Plains Pipeline" or "Plains") file this Response to Order No. 11. Plains confirms its consent and agreement to the modifications to link B2 discussed in the briefing in this case.

The inclusion of footnote 9, as referenced in Order No. 11, was based on a discussion with counsel for Applicants wherein there was some indication that consent of the property owner for the Property No. 476 could be required because of the slight change to the point at which the line might enter that property. Out of an abundance of caution regarding candor to the Administrative Law Judges, Plains acknowledged this possiblity in footnote 9. However, even if the consent of the owner of the property for Property No. 476 were required and that consent was withheld, Plains consents to the relocation of link B2 to follow the west side of the pipeline right-of-way shown on the maps which would also increase the distance of the proposed route from the man camp identified in this proceeding. A depiction of this second alternative is shown in Figure 1 as a white dashed line.



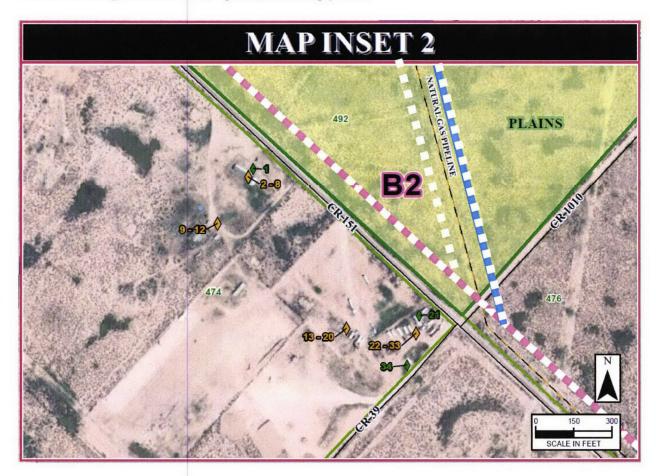


Figure 1: Selection from Intervenor Map, Oncor/AEP Ex. 10A—Habitable Structures

Pink-white dashed line = proposed transmission line, link B2. Blue-white dashed line = approximate location of link B2 modification (added). White dashed line = approximate location of alternative modification of link B2. Orange numbered diamonds = habitable structure clusters, all of which are mobile living units (MLUs). Green numbered diamonds = habitable structures, nos. 1 and 21 are single-family residences, no. 34 is a MLU. Light green shading = Plains' property (intervenor). Orange-black dashed line = pipeline.

Based on Plains consent to modify the route to increase the distances from the property on which the man camp was located at the time of the field survey and based on the arguments in Plains' Briefing and the briefing of all of the intervenors in this proceeding, Plains respectfully requests that the Administrative Law Judges recommend approval of Route 320 or Route 325

¹ See Oncor/AEPTX Ex. 1 at 22-23.

² See id.

Consolidated P.U.C. Docket No. 48785 Consolidated SOAH Docket No. 473-19-1265 Plains Marketing, L.P. and Plains Pipeline, L.P.'s Reply Brief

(with modification as proposed by Concho and Oxy), and that the Commission adopt that recommendation.

Respectfully submitted,

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By

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ATTORNEYS FOR PLAINS MARKETING, L.P. AND PLAINS PIPELINE, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on March 19, 2019.

Catherine J. Webking